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JUN 25 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Permissible Written Ex Parte Presentation in
MM Docket No. 93-8

Dear Ms. Searcy:

Pursuant to Section 1.1206(a)(1) of the Commission's rules, enclosed herewith for filing with Commission are two copies of a letter from the Executive Director of Associated Public-Safety Communications Officers, Inc. ("APCO") to the Chairman of the Commission. The letter, which was hand-delivered today, addresses the Commission's Notice of Proposed Rulemaking in MM Docket No. 93-8. Copies of the letter have also been delivered to Commissioners Barrett and Duggan.

Please contact the undersigned if you have any questions.

Respectfully submitted,

WILKES, ARTIS, HEDRICK & LANE
Chartered

By:


Robert M. Gurss

Attorneys for APCO

Enclosure

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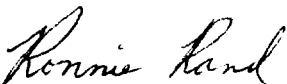
The Honorable James H. Quello
June 25, 1993
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In stark contrast, a home shopping station uses its valuable 6 MHz wide UHF channel for the sole purpose of broadcasting a continuous stream of commercials. As Congress has often stated, "radio services which are necessary for the safety of life and property deserve more consideration in allocating spectrum than those services which are more in the nature of convenience or luxury." S.Rep. No. 191, 97th Cong., 2d Sess. 14 (1981), reprinted in 1982 U.S. Code Cong. & Ad. News 2237, 2250. See also National Association of Broadcasters v. FCC, 740 F.2d 1190, 1213-14 (D.C. Cir. 1984). Without question, home shopping stations deserve far less consideration than public safety services, which constitute the highest possible use of the spectrum.

Therefore, I urge the Commission not to take any action, including granting of "must carry" status, that will promote and/or give further credence to home shopping stations' inefficient and inappropriate use of scarce radio spectrum.

A copy of this letter has been submitted to the Secretary for inclusion in the record on MM Docket 93-8.

Respectfully submitted,


Ronnie Rand
Executive Director

cc: Commissioner Ervin S. Duggan
Commissioner Andrew C. Barrett